

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name and Address):		TELEPHONE NO.:	CASE NUMBER:
Toby L. Plevin, Esq. 6380 Wilshire Blvd., Suite 1600 L.A., CA 90048		(213) 655-3183	C 694 401
ATTORNEY FOR (Name): Bent Corydon		DEPOSITION SUBPENA For Personal Appearance <input checked="" type="checkbox"/> and Production of Documents and Things	
NAME OF COURT: L.A.S.C.			
POST OFFICE and STREET ADDRESS: 111 N. Hill St., L.A., CA 90012			
PLAINTIFF/PETITIONER:			
DEFENDANT/RESPONDENT: Bent Corydon Church of Scientology International			

THE PEOPLE OF THE STATE OF CALIFORNIA, TO *(name, address, and telephone No. of deponent, if known):*

Gerold Armstrong

1. YOU ARE ORDERED TO APPEAR IN PERSON TO TESTIFY AS A WITNESS in this action at the following time and place:

Date: October 20, 1989	Time: 10:00a.m.	Address: Law Offices of Ford Greene 711 St. Francis Drake San Anselmo, CA 94960
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- a. ☐ As a deponent who is not a natural person, you are ordered to designate one or more persons to testify on your behalf as to the matters described in item 3. (Code of Civil Procedure section 2025 (d)(6).)
- b. ☒ You are ordered to produce the documents and things described in item 3.
- c. ☐ This deposition will be recorded by ☐ audiotape ☐ videotape and stenographically.
- d. ☐ This videotape deposition is intended for possible use at trial under Code of Civil Procedure section 2025 (u)(4).
2. ☐ The personal attendance of the custodian of records or other qualified witness ☐ and the production of the original documents are required by this deposition subpoena. The procedure authorized by Evidence Code sections 1560 (b), 1561, and 1562 will not be deemed sufficient compliance with this subpoena.
3. ☒ The documents and things to be produced and any testing or sampling being sought are described as follows:

See Exhibit "A", Attached

☐ Continued on attachment 3.

4. A deposition permits an attorney to ask questions of a witness who is sworn to tell the truth. An attorney for other parties may then ask questions also. Questions and answers are recorded stenographically at the deposition; later they are transcribed for possible use at trial. A witness may read the written record and change any incorrect answers before signing the deposition. The witness is entitled to receive witness fees and mileage actually traveled both ways. The money must be paid, at the option of the party giving notice of the deposition, either with service of this subpoena or at the time of the deposition.


5. You are ordered to appear in this civil matter in your capacity as a peace officer or other person described in Government Code section 68097.1.

Date: _____ Clerk, by _____, Deputy

DISOBEDIENCE OF THIS SUBPENA MAY BE PUNISHED AS CONTEMPT BY THIS COURT. YOU WILL ALSO BE LIABLE FOR THE SUM OF FIVE HUNDRED DOLLARS AND ALL DAMAGES RESULTING FROM YOUR FAILURE TO OBEY.

Date issued: September 28, 1989

... Toby L. Plevin
(TYPE OR PRINT NAME)


 (SIGNATURE OF PERSON ISSUING SUBPENA)
 ATTORNEY FOR PLAINTIFF
 (TITLE)

(See reverse for proof of service)

1 EXHIBIT "A" TO SUBPOENA DUCES TECUM

2 SCHEDULE OF DUCUMENTS TO BE PRODUCED

3 The witness is requested to produce all these documents as
4 described below, within his possession, custody or control.

5 A. DEFINITIONS AND EXPLANATIONS

6 1. As used herein, the term "document" includes all
7 written, typewritten, printed and graphic materials of whatever
8 kind or nature, including, but not limited to, correspondence,
9 notes, memoranda, telegrams and cables, telexes, telecopies,
10 panafaxes, publications, contracts, agreements, insurance
11 policies, minutes, offers, analyses, projections, studies, books,
12 papers, records, reports, lists, calendars, diaries, statements,
13 complaints, filings with any court, tribunal or governmental
14 agency, corporate minutes, partnerships, agreements, ledgers,
15 transcripts, summaries, agendas, bills, invoices, receipts,
16 estimates, evaluations, personnel files, certificates,
17 instructions, manuals, bulletins, advertisements, periodicals,
18 accounting records, checks, check stubs, check registers,
19 cancelled checks, money orders, negotiable instruments, sound
20 recordings, films, photographs, mechanical or electronic
21 recordings, tapes, transcriptions, blueprints, computer programs
22 and data, and data processing cards.

23 2. As used herein, the term "document" further means all
24 writings, originals and duplicates as defined in California
25 Evidence Code Sections 250, 255, and 260, whether in draft, or
26 otherwise, including but not limited to, copies and non-identical
27 copies (whether different from the originals because of notes or
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1 marks made on or attached to said copies, or otherwise).

2 3. The words "and" and "or" as used herein shall both mean
3 "and/or."

4 4. If in response to this Notice to Produce Documents at
5 Deposition you decline or refuse to produce any document based
6 upon a claim of privilege, at the time of taking of this
7 deposition you will be expected to state with respect to each
8 such document the following:

9 (a) An identification of the document with reasonable
10 specificity and particularity, including its nature (memo,
11 letter, etc.), title and date;

12 (b) The exact nature of the privilege asserted;

13 (c) All of the facts upon which your claim of privilege
14 is based or which supports said claim;

15 (d) With respect to each person who was present at the
16 time the document was prepared:

17 (1) Their name and last known business and
18 residential addresses and telephone numbers; and

19 (2) Their employer and job title or capacity at
20 the time that the document was prepared;

21 (e) With respect to each individual and entity to whom
22 the original or a copy of the document was sent:

23 (1) Their name and last known business and
24 residential addresses and telephone numbers;

25 (2) Their employer and job title or capacity at
26 the time that the original or the copy of the document
27 was sent to them;

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1 (3) The date(s) when the document or copy was
2 sent; and

3 (4) By whom the document or copy was sent;

4 (f) With respect to each individual and entity who to
5 the best of your knowledge, information or belief has seen
6 the original or any copy of the document:

7 (1) Their name, and last known business and
8 residential addresses and telephone numbers;

9 (2) Their employer and job title or capacity at
10 the time the document or copy was seen by them; and

11 (3) The date(s) when the document or copy was seen
12 by them.

13 (g) With respect to each individual or entity who to
14 the best of your knowledge, information or belief had
15 possession or custody of the original or any copy of the
16 document:

17 (1) Their name, and last known business and
18 residential addresses and telephone numbers;

19 (2) The inclusive dates during which they had
20 possession or custody of the document or copy; and

21 (3) Their employer and job title or capacity at
22 the time that they had possession of the document or
23 copy; and

24 (h) Identify with reasonable specificity and
25 particularity each document which refers to, discusses,
26 analyzes, or comments upon the document which you claim is
27 privileged, or which contains any and all of its contents.
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1 B. DOCUMENTS AND THINGS TO BE PRODUCED

2 1. Any and all agreements and mutual releases between you
3 and any and all Church of Scientology entities and individuals
4 arising out of the lawsuit captioned Church of Scientology of
5 California v. Gerold Armstrong and the related cross-action.

6 2. Any and all documents referring or relating in any way
7 to the agreement(s) and/or release(s) in Category 1 above
8 including without limitation affidavits of compliance and
9 correspondence or memos explaining the terms of the agreement.

10 3. Any and all documents referring or relating to
11 potential threats of enforcement of the agreements and releases
12 referenced in Category 1, above.

13 4. Any and all documents received by you subsequent to the
14 agreements and/or releases set forth in Category 1 above from
15 any Scientology organization or person or from any person you
16 believe to be representing or working on behalf or any
17 Scientology organization or person.
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